

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

United States of America,

plaintiff,

v.

Todd Takata, [01]

Michael Allen Bush, [02]

Lani Ann Brewer, [03]

defendants.

Cr. No. 04-00134 SOM

U.S.C. §846 and 18 U.S.C. §2

DECLARATION OF COUNSEL

Stuart N. Fujioka, an attorney duly licensed before this Honorable Court, hereby declares under penalty of law that the following is true and based on personal knowledge.

1. I am counsel for defendant and am authorized to make this declaration.
2. Defendant is in compliance with the terms of his release and has made all of his court appearances.
4. Defendant has completed outpatient substance abuse treatment.
5. Defendant remains employed by David Bush, and has been residing on his own at 1868 Kahakai Dr. #310 Honolulu, HI 96814 ph. 941-1414.
 - a. He was initially released to Mahoney Hale, then permitted to live with David before securing his own

residence, all as the result of progressive modifications to his pretrial release.

6. While his father Sam Bush was terminally ill at a hospital in Spain, defendant was allowed to retrieve his passport and travel there from Sat. March 4, 2006 to Monday, March 13, 2006.

- a. Defendant made the trip and returned his passport without incident.
- b. Shortly thereafter, the elder Bush passed away.
- c. It was decided in accordance with the decedent's wishes and that of family members that the funeral service is to be held at the Church of Religious Science, 7641 Talvert Av. Huntington Beach, CA [714] 596-0900.
- d. Defendant respectfully requests modification of his pretrial release to permit travel to the funeral; if allowed, he will leave Hawaii on April 12, 2006 and return on 4/19/06 - In California he will stay with his brother Jeff Bush at 601 Avenida Vaquero San Clemente, CA 92673, ph. [949] 481-0582.

Dated: Honolulu, Hawaii, APR 4 2006.



Stuart N. Fujioka

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was duly mailed, postage prepaid, or hand delivered to:

*Thomas Muehleck
300 Ala Moana Blvd. Ste. 6100
Honolulu, Hawaii 96850*

for the United States of America

*Alison Thom
U.S. Pretrial Services
300 Ala Moana Blvd. 7-222
Honolulu, HI 96850*

Dated: Honolulu, Hawaii, April 4, 2006.



Stuart N. Fujioka